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*Lead Counsel for the Proposed Class*

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8 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

9

10 IN RE TWITTER, INC. SECURITIES  
11 LITIGATION

No. 4:19-cv-07149-YGR

12 **CLASS ACTION**

13 This Document Relates To:

14 ALL ACTIONS.

15 **DECLARATION OF MARIO M. CHOI**  
**IN SUPPORT OF JOINT**  
**STIPULATION AND PROPOSED**  
**ORDER EXTENDING TIME**

16 Judge: Hon. Yvonne Gonzalez Rogers  
Courtroom: 1, 4<sup>th</sup> Floor

17 I, Mario M. Choi, declare and state as follows:

18 1. I am an attorney at the law firm of Kaplan Fox & Kilsheimer LLP (“Kaplan Fox”),  
19 one of co-lead counsel for Weston Family Partnership LLLP and the Twitter Investor Group (“Lead  
20 Plaintiffs”). If called a witness, I would and could competently testify thereto to all facts within  
21 our personal knowledge.

22 2. On November 22, 2019, the Court so ordered a joint stipulation that provided,  
23 among other things, that within 45 days following the appointment of a lead plaintiff, a consolidated  
24 complaint will be filed, and set forth a briefing schedule for Defendants’ anticipated motion to  
25 dismiss (ECF No. 21).

26 3. On February 12, 2020, the Court so ordered the appointment of the Weston Family  
27 Partnership LLLP and the Twitter Investor Group as Lead Plaintiffs (ECF No. 45). The Court also

appointed Pomerantz LLP and Kaplan Fox as co-lead counsel, and Levy & Korsinsky LLP as additional counsel. *Id.*

4. Based upon the November 22, 2019 stipulation and the February 12, 2020 order appointing Lead Plaintiffs, a consolidated complaint is due to be filed on March 30, 2020; Defendants' motion to dismiss is due to be filed on May 14, 2020; Lead Plaintiffs' opposition to Defendants' motion to dismiss is due to be filed on June 29, 2020; and Defendants' reply is due to be filed on July 29, 2020.

5. Counsel for Lead Plaintiffs met and conferred with counsel for Defendants and respectfully submit that good cause exists for a brief extension of fourteen (14) days for all deadlines in light of the Coronavirus (COVID-19) Disease Public Health Emergency and related closures of the offices of counsel for Lead Plaintiffs and the mandatory shelter-in-place orders affecting counsel in California for Defendants and Lead Plaintiffs.

6. This request is Lead Plaintiffs' and Defendants' first request to modify the schedule for the filing of the consolidated complaint and motion to dismiss briefing and this modification does not affect any other deadlines set by the Court.

Executed this 23<sup>rd</sup> day of March, 2020, in Oakland, California.

/s/ Mario M. Choi  
Mario M. Choi

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Laurence D. King, attest that concurrence in the filing of this document has been obtained from the signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of March, 2020, at Oakland, California.

/s/ Laurence D. King  
Laurence D. King